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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO SEVENTEENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (NO BASIS FOR CLAIM –
FAILURE TO PROVIDE ANY TRADING
INFORMATION) AND REQUEST FOR
ORDER BY DEFAULT AS TO UNOPPOSED
OBJECTIONS**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

[Re: Dkt. No. 11561]

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

**Resolving Objections Set for Hearing
December 21, 2021 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that
8 the Court enter an order by default on the *Reorganized Debtors’ Seventeenth Securities Claims Omnibus*
9 *Objection (No Basis for Claim – Failure to Provide Any Trading Information)* [Docket No. 11561] (the
10 “**Seventeenth Securities Claims Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE SEVENTEENTH SECURITIES CLAIMS**

12 **OMNIBUS OBJECTION**

13 The Seventeenth Securities Claims Omnibus Objection seeks to disallow and expunge the proofs
14 of claim that were filed by PG&E security holders who have failed to provide information establishing
15 that the claimants traded in PG&E securities and thus these proofs of claim lack any basis to assert
16 liability against the Reorganized Debtors. These claims are listed in **Exhibit 1** to the Seventeenth
17 Securities Claims Omnibus Objection.

18 **NOTICE AND SERVICE**

19 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Seventeenth*
20 *Securities Claims Omnibus Objection (No Basis for Claim – Failure to Provide Any Trading*
21 *Information)* [Docket No. 11563] (the “**Notice of Hearing**”). The Seventeenth Securities Claims
22 Omnibus Objection was supported by the *Declaration of Justin R. Hughes in Support of Reorganized*
23 *Debtors’ Seventeenth Securities Claims Omnibus Objection (No Basis for Claim – Failure to Provide*
24 *Any Trading Information)* [Docket No. 11562] (the “**Hughes Declaration**”). The Seventeenth Securities
25 Claims Omnibus Objection, the Notice of Hearing, and the Hughes Declaration were served as described
26 in the *Certificate of Service* of Alain B. Francoeur, filed on November 12, 2021 [Docket No. 11578] (the
27 “**Certificate of Service**”). As further described in the Certificate of Service, on November 9, 2021, each
28 holder of a claim listed on **Exhibit 1** to the Seventeenth Securities Claims Omnibus Objection received

a notice including the claim number, debtor, claim amount and priority, and the basis for the Reorganized Debtors' objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Seventeenth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following responses:

Docket No.	Claimant	Claim No.	Resolution
Informal	Carol A. Lord Revocable Living Trust	104536	Claimant provided trading data in response to the omnibus objection. The Reorganized Debtors have removed this claim from Exhibit A to this Request and withdraw the objection to this claim without prejudice.
Informal	Estate of Robert W. Lord	104552	Claimant provided trading data in response to the omnibus objection. The Reorganized Debtors have removed this claim from Exhibit A to this Request and withdraw the objection to this claim without prejudice.
Informal	Principal Funds, Inc - EDGE MidCap Fund	101866	Claimant sent an email after the filing of the Motion stating that it did not trade in PG&E securities from April 29, 2015 through November 15, 2018. The omnibus objection should thus be sustained with respect to this claim.
Informal	Principal Variable Contracts Funds, Inc. - Large Cap Blend Account II	101751, 101911	Claimant sent an email after the filing of the Motion stating that it did not trade in PG&E securities from April 29, 2015 through November 15, 2018 which confirmed an earlier submission that informed PG&E that the fund had been terminated in 2015 prior to this period. The omnibus objection should thus be sustained with respect to these claims.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- I am a partner with the law firm of Weil, Gotshal & Manges LLP ("Weil"), counsel for the Reorganized Debtors.
- The Court's docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Seventeenth Securities Claims Omnibus Objection except as described herein.

1 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and
2 expunging the proofs of claim listed in the column headed "Claim to be Disallowed/Expunged" in
3 **Exhibit A** to this Request, which listed claims identical to those in **Exhibit 1** to the Seventeenth
4 Securities Claims Omnibus Objection, except as otherwise discussed above.

5 Dated December 14, 2021

6 **WEIL, GOTSHAL & MANGES LLP**

7 **KELLER BENVENUTTI KIM LLP**

8
9 By: /s/ Richard W. Slack

10 Richard W. Slack

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12 *Attorneys for Debtors and Reorganized Debtors*